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RECEIVED

OCT 28 2013

AT 8:30 _____ M
WILLIAM T. WALSH CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ROSS UNIVERSITY SCHOOL OF
MEDICINE and GLOBAL EDUCATION
INTERNATIONAL, INC.,

Plaintiffs,

v.

BEHZAD AMINI, WWW.ROSSU.NET,
WWW.ROSSMEDICALSCHOOL.ORG,
WWW.ROSSMEDSCHOOL.COM and
WWW.JOHNDOEROSSINFRINGINGSITES1
-20.DOE

Defendants.

Civil Action No. 3-13-cv-06121

**ORDER PROVIDING FOR
CONTINUING INJUNCTION**

This matter comes before the Court upon the application of plaintiffs Ross University School of Medicine ("RUSM") and Global Education International, Inc. (collectively "Plaintiffs") pursuant to Federal Rule of Civil Procedure 65, for entry of a preliminary injunction against defendants Behzad Amini, www.RossU.net, www.RossMedicalSchool.org, www.RossMedSchool.com and www.JohnDoeRossInfringingSites1-20.doe (collectively "Defendants"), and the Court having considered the submissions of the parties, and both parties having provided oral argument on October 28, 2013,

IT IS on this 28th day of October, 2013,

HEREBY ORDERED THAT, FOR THE REASONS STATED ON THE RECORD ON OCTOBER 28, 2013 AND BECAUSE THE PARTIES AGREED THAT THE COURT SHOULD HAVE FURTHER TIME TO REVIEW EACH PARTY'S SUBMISSIONS, THE RESTRAINTS ENTERED BY THIS COURT ON OCTOBER 16, 2013 ARE CONTINUED FOR GOOD CAUSE SHOWN IN THE FORM OF THIS INJUNCTION ORDER PENDING FURTHER ORDER OF THE COURT, TO WIT:

1. Defendant Behzad Amini is hereby required to immediately identify to Plaintiffs' counsel and the Court each and every URL he has registered that contains the word "Ross," and Defendant Behzad Amini will be considered in violation of this Order if same has not occurred within three (3) business days.

2. Defendants, and all those acting in concert with Defendants, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby enjoined and restrained during the pendency of this litigation or until further Order of this Court, from:

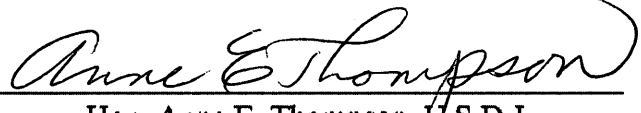
- a. Directly or indirectly publishing or disseminating, whether through the Offending, Infringing Sites or other outlets or mediums, any statements that would disparage, reflect negatively upon or otherwise call into question RUSM's business operations, products, services, integrity, reputation or business relationships, or the business operations, products, services, integrity, reputation or business relationships of RUSM and/or any of its parent, subsidiary or any other affiliated entities, and any and all of its or their former and current members, principals, directors, officers, shareholders, employees, agents, attorneys, contractors, representatives, affiliates, predecessors, successors and assigns, including but not limited to any further disparaging communications with representatives of RUSM's affiliated institutions or governmental regulators or any of recipients of the emails identified in the Verified Complaint at paragraphs 65, 68, 78 and 82;
- b. Using the Offending, Infringing Sites in any manner; and
- c. Attempting to sell, selling or transferring any interest in the Offending,

Infringing Sites.

3. Defendants, and all those acting in concert with Defendants, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby directed to Cancel immediately the links on defendant Amiri's webpage through the Offending, Infringing Sites URLs, and Defendant Behzad Amiri will be considered in violation of this Order if same has not occurred within three (3) business days.

4. This Order is without prejudice to the Court's further consideration of the issues presented, and modification of this Order after such consideration, either after subsequent hearing to be scheduled or consistent with Rule 78 of the Federal Rules of Civil Procedure, as the Court recognizes that plaintiffs seek additional preliminary and permanent relief (in the form of transfer of domain name registrations) and as the Court wishes to examine further submissions by defendant.

5. Plaintiffs shall not be required to post a bond.


Hon. Anne E. Thompson, U.S.D.J.

**EPSTEIN
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October 28, 2013

VIA FAX (609) 989-2007

Hon. Anne E. Thompson, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Ross University School of Medicine et al. v. Behzad Amini et al.
Case No.: 3:13 cv 06121

Dear Judge Thompson:

As Your Honor is aware, plaintiffs filed a proposed form of order with their reply papers, and that ultimately contains the full preliminary relief that plaintiffs seek. Nevertheless, enclosed please find a copy of newly proposed Order extending the restraints previously imposed upon defendants by Order dated October 16, 2013. As discussed during today's hearing, Your Honor wished restraints extended while giving further consideration to the issues raised, which the parties agreed should occur. This attached Order continues the restraints pending further order by this Court, and reserves each party's respective rights.

Respectfully submitted,


James P. Flynn

JF:mtk
Enclosure

cc: Ben Amini (via email)